DEPARTMENT OF SOCIAL SERVICES 744 P Street, Sacramento, CA 95814

January 13, 1987



ALL-COUNTY INFORMATION NOTICE I- 01-87

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: TNCOME

INCOME AND ELIGIBILITY VERIFICATION SYSTEM (IEVS)

REFERENCE:

JUNE 16, 1986 LETTER TO ALL COUNTY WELFARE DIRECTORS

The purpose of this letter is to provide counties with updated information on the status of statewide IEVS implementation. Much progress has been made since our last correspondence (i.e., June 16, 1986 letter sent to all county welfare directors). During the last several months we have worked closely with the IEVS County Advisory Group established through CWDA, sharing information and seeking valuable county input on various implementation activities.

The State Department of Social Services (SDSS) and the State Department of Health Services (SDHS) have been working jointly toward statewide implementation of the federally mandated matching system, affecting the Medi-Cal Only (MCO), AFDC and Food Stamp programs. The system has been divided into two distinct components, one for recipients and one for applicants. SDSS has assumed responsibility for the modification and operation of the recipient system since the department's existing recipient matching systems already satisfy a majority of IEVS requirements for recipients. The applicant matching system, which is new to California, is being developed by SDHS, utilizing the existing statewide MEDS communication network.

There will be pilot tests of both the applicant system and, for MCO only, the recipient system. The pilots are expected to begin in January, 1987 and continue through the end of June, 1987. During this period the newly developed applicant system will be tested and necessary modifications to the system will be made immediately upon the identification of problems. We will also be evaluating the cost effectiveness of required matches and gathering data on county workload related to IEVS through time studies. If it is found through this process that certain matches are not cost-effective, this information may be used later to seek changes in federal law.

The following counties are participating in IEVS pilots:

County

Start Date of Pilot Project

Alameda (Applicant pilot only)
Merced
Sacramento
San Diego
Tulare (MCO recipient pilot only)

March, 1987 February, 1987 January, 1987 March, 1987 January, 1987

We have developed a 12-month phase-in statewide implementation plan for the applicant system for all three programs, beginning October 1, 1987. A proposed, county-by-county implementation schedule is attached along with the criteria used in developing the schedule. If the counties foresee any problem in meeting the proposed implementation schedule due to the implementation of another major project scheduled in the same month as IEVS, please let us know in writing within two weeks of the date of this letter. The letter should be sent to the following:

Michael F. Back, Chief Fraud Program Management Bureau 744 P Street, M.S. 19-26 Sacramento, CA 95814

Implementation of the recipient system for AFDC and Food Stamps will occur in all counties in July 1987 when proposed state regulations are expected to take effect; however, the data from the federal wage match required by IEVS will not be available until September 1987. The implementation schedule for the recipient system for MCO will be sent to the counties at a later date.

SDHS and SDSS are planning to conduct joint training workshops on the applicant system and for MCO only, the recipient system. The training schedule will coincide with the county-by-county implementation schedule.

Proposed state regulations governing county IEVS requirements for AFDC and Food Stamps are scheduled for public hearing in January 1987. Proposed MCO regulations are expected to be heard at a public hearing in March 1987.

Budget requests submitted by SDHS and SDSS for the Fiscal Year (FY) 1987/88 include funds for the anticipated increase in county administrative costs resulting from the implementation of IEVS. As a premise item, we will make a separate allocation for nondata processing (DP) IEVS costs for FY 1987/88. Therefore, IEVS will not be handled through the Cost Control Questionnaire. Premise funds are also committed to DP modification costs for IEVS.

For any county DP modifications or enhancements, the counties must submit their proposal to the County Approval Section of SDSS for review and approval. The proposal must include the county's need for hardware as well. To expedite this process we will be providing you shortly with a Cost Benefit Analysis (CBA)/Implementation Plan (IP) form, instructions on how to complete the form, and other necessary information the counties require to identify their need for DP modifications. IEVS requests will receive a priority review by the County Approval Section.

To assist the counties with budgeting and planning for the implementation of IEVS, the following information is attached:

Attachment A

- o Detailed description of the IEVS recipient system
- o County follow-up and notification requirements
- o Statewide recipient implementation plan
- o Estimated number of "hits" for IEVS matches

Attachment B

o Detailed description of the IEVS applicant system

Attachment C

- o Proposed county-by-county applicant implementation schedule
- o Criteria used to develop the schedule

Attachment D

o June 16, 1986 letter to all county welfare directors

Future correspondence with the counties will include the CBA/IP form and instructions, user guides for the IEVS applicant system, input/output data formats, and IEVS data security guidelines. Any county needing more information regarding IEVS should contact the following individuals.

For AFDC and Food Stamps:
Michael F. Back, Chief
Fraud Program Management Bureau
State Department of Social Services
(916) 924-2836, (ATSS) 434-2836

For MCO:

Ross Farmer, Chief
Income and Eligibility
Verification Unit
Medi-Cal Eligibility Branch
State Department of Health Services
(916) 324-4959, (ATSS) 854-4959

We are looking forward to working with the counties toward successful implementation of IEVS.

BOBERT A. HOREL Deputy Director

Welfare Program Division

Department of Social Services

FRANK MARTUCCI, CHIEF

Medi-Cal Eligibility Branch Department of Health Services

Attachments

cc: CWDA

IEVS RECIPIENT SYSTEM

The IEVS Recipient System is going to be a compilation of three computer matching systems currently operated by SDSS. These systems are the Integrated Earnings Clearance/Fraud Detection System (IFD), Payment Verification System (PVS) and the Asset Match System (AMS). A description of each existing system and the enhancements being made to those systems to meet the IEVS requirements are described below.

IFD

This system identifies unreported wages as well as duplicate aid for AFDC, Food Stamps, and SSI/SSP recipients. On a quarterly basis, counties submit information on all their AFDC and Food Stamp (FS) cases to SDSS. This data includes income reported by the recipient household to the county.

The reported income is then matched with wages reported by employers to the Employment Development Department (EDD). AFDC cases with discrepancies over \$301 and Nonassistance Food Stamp (NAFS) cases with discrepancies over \$701 are sent to the counties for case follow-up. Counties determine if any case action is required and then complete a response document notifying DSS of the case action within 120 days.

In order to meet IEVS requirements, the IFD system is going to be modified in several ways.

The MCO population is going to be added to the existing AFDC/FS file. On a quarterly basis SDSS will receive from the SDHS Eligibility History File (EHF), the statewide MCO population. Any MCO case that has wages reported by EDD will be sent to the county along with the AFDC and FS cases requiring processing. SDHS will determine an appropriate discrepancy/cutoff level to be used with MCO cases, based on the data from the pilot tests.

A further enhancement of the IFD system will be to compare the AFDC/FS/MCO file with the Beneficiary Earnings Exchange Record (BEER) file supplied by the Social Security Administration (SSA). The BEER file contains wages reported by employers nationwide to SSA via the IRS. The BEER wages earned by California recipients that were not included in the EDD file (e.g., military, out-of-state, federal, and self-employment) would be sent to the counties along with other EDD wages.

PVS

The PVS system currently identifies Unemployment Insurance (UI), Disability Insurance (DI), Retirement, Survivors and Disability Insurance (RSDI) benefits being paid by EDD and SSA to AFDC and MCO recipients. This system will continue to operate on a monthly basis with the major enhancement being the inclusion of the NAFS population to the recipient universe. The NAFS population will be obtained from the Central Data Base to be completed statewide in April 1987.

AMS

This system, which has been operating statewide since January 1985, identifies interest/dividend income earned by AFDC and FS recipients. The IFD file is matched with the Franchise Tax Board's (FTB) interest and dividend (599) file. The 599 file contains interest and dividend information from financial/investment institutions in California. Currently, the matched data is first reviewed by SDSS staff then referred to the county SIU for investigation when appropriate.

This system will be modified by including the MCO population in the FTB match. Also, the AFDC/FS/MCO file will be matched with the IRS interest and dividend (1099) file. The 1099 interest and dividend earned by California recipients that were not included in the FTB 599 file will be sent to the counties along with the other FTB information. A request has been submitted to the federal agencies asking that FTB be used as the exclusive source of interest/dividend income. This would eliminate the need for creating a match with a new data source (IRS).

Under IEVS, the counties will be responsible for conducting the initial case review to determine if the asset had been reported. The follow-up can be done by county eligibility workers, referral of the case to the county SIU, or for MCO cases, referral to SDHS Audits and Investigation Unit.

It is expected that the federal agencies will allow states to use a cutoff level. It is being planned that a case with interest/dividend income of less than \$50 for AFDC or \$100 for NAFS will not require county follow-up. A cutoff level for MCO cases will be developed upon completion of the pilot county study.

County Follow-Up and Notification Requirements

In accordance with federal IEVS requirements, counties will have a specific time period in which case reviews must be completed. Counties must complete 80% of the case review within 30 days after SDSS completes the match. A waiver request has been submitted to USDA to allow up to 60 days to review FS cases. DHHS is in the process of revising their regulations to extend the review period to 45 days for AFDC and MCO cases. It is expected that the federal agencies will allow the use of cut off/discrepancy levels for all three aid programs.

Federal IEVS regulations also require that recipients of AFDC, Food Stamps and MCO be notified in writing at annual redetermination or at each recertification, that information available through IEVS will be requested, used and may be verified through collateral contact when discrepancies are found by the counties, and that such information may affect the recipient's eligibility and level of benefits. In order to meet this requirement we will be revising the CA 20, DFA 285-A2., MC 210 and MC 217.

Other federal IEVS regulations require state agencies to monitor case reviews conducted by the counties to determine compliance with regulations. The method for monitoring county compliance is still being evaluated. The alternatives range from counties completing response documents to be sent in to SDSS, to counties maintaining statistical data in case folders to be retrieved upon request.

Statewide Implementation Schedule

Implementation of the IEVS recipient system for AFDC and Food Stamps will occur in all counties according to the following schedule:

PVS - July 1987

NAFS recipients will be included in the UI and DI portion of PVS effective June 1987. In July 1987

NAFS recipients will be included in RSDI as well as UI and DI.

AMS - July 1987

IFD - September 1987 Federal wage information will be transmitted to the counties along with state wage information effective September 1987.

The implementation schedule of the recipient system for MCO cases will be sent to the counties at a later date.

Estimated Number of "Hits" for IEVS Matches

PVS - It is estimated that by adding NAFS to PVS, the number of matches to be followed up by the county will increase by the following percentage of the county NAFS caseload; however, only 4% of these cases are expected to actually show some discrepancy, requiring case action.

Unemployment Insurance Cases - 12%
Disability Insurance Cases - 2%
Retirement, Survivors, Disability Insurance Cases - 8%

- IFD It is estimated that 16% of the county MCO population will have some earnings reported by EDD. When the pilot county data is evaluated, a discrepancy/cutoff level will be determined which will be used to reduce the number of cases requiring county follow-up.
- AMS It is estimated that 9% of the county MCO population will have some interest/dividend income reported by FTB. When the cut-off level is determined, it will be used to reduce the number of cases to be processed.

For AFDC and NAFS, the number of matched cases the counties would receive will increase effective July 1, 1987 as the state will no longer be conducting initial case reviews after that date. It is estimated that 4 to 5% of the AFDC and NAFS cases will have interest/dividend income in excess of \$50. Of these, approximately 40% are expected to require follow-up action beyond the initial case review.

IEVS APPLICANT SYSTEM

The IEVS applicant system will be a new system which will operate entirely independent of the recipient system. The system centers around the county inputting and receiving information via the MEDS network operated by SDHS.

After an applicant applies to the county for AFDC, Food Stamps, or Medi-Cal, the county will submit identifying information (name, SSN, etc.) to SDHS. One of the methods of transmitting the data will be via the MEDS terminals located in the county. Other methods include transmitting batches of data via computer tape or phone lines connecting the county computer with SDHS.

Prior to the submission of applicant data to the applicant data base, counties are required to inform the applicant in writing that certain information will be obtained through IEVS and how the IEVS information will be used. The CA 1, CA 2, CA 8, DFA 285-A1, MC 210 and MC 217 will be revised to incorporate this notification requirement.

SDHS will collect the applicant data and match it against various sources of income or benefit information. The sources and information to be obtained are as follows:

- EDD Wages and related employer addresses, Unemployment Benefits, Disability Benefits
- FTB Interest, Dividend Income
- SSA Retirement, Survivors, and Disability Insurance Benefits, Social Security Number Verification

SDHS will request information from these sources twice per week; thus, it will be made available to counties in 2 to 4 work days. When the information becomes available from any of the sources, it will be made available to the county on the MEDS Terminal. When the information becomes available from all the sources, the information can either be printed at the county or a computer tape can be mailed to the county from SDHS. The county will then review and verify this information to determine its effect on the eligibility of the applicant. If the information is received by the county after aid has been granted, the county should use the information as it would apply to a recipient.

PROPOSED IEVS APPLICANT IMPLEMENTATION SCHEDULE

(October 1987 - September 1988)

Alameda	tober 198	Orange	December 1987
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S.	ebruary 198	anta	anuary
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Mono		2	ember 1
Monterey	ugust 198	e D	ebruary 198
Napa	ugust 198	Yolo	
	∞		January 1988

Assumptions/Criteria for Statewide Implementation Schedule for the Applicant System

(12 Month Plan)

- o Give consideration to other major projects scheduled for implementation in the county in the month of IEVS implementation.
- o Avoid or minimize federal fiscal sanctions by planning implementation for 70% to 75% of the statewide caseload by midway through the plan or by the end of the seventh month.
- o Give consideration to the extent of EDP modifications necessary for IEVS implementation in the county.
- o Implement counties with different types of EDP systems (e.g., case data, Butte) early on so that any systems problems can be identified and fixed as early as possible.
- o Counties should be physically accessible in the month of implementation.
- o Consider geographical location of counties for training purposes.

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
- SACRAMENTO, CA 95814

(916) 322-2214

(916) 324-4950



June 16, 1986

To: All County Welfare Directors

SUBJECT: Income and Eligibility Verification System (IEVS)
Status Report and Solicitation of Pilot Counties

The purpose of this letter is twofold:

- 1. To inform counties of the new Federal requirements for an Income and Eligibility Verification System (IEVS) and the status of its development in California.
- 2. To solicit counties' participation as a pilot county for the IEVS Applicant system, Recipient system, or both.

Summary of IEVS Requirements

The following summarizes the Federal IEVS requirements:

- o IEVS is mandated by Federal regulations promulgated to implement Section 2651 of the Deficit Reduction Act which was enacted by Congress in 1984.
- o Requires that State agencies administering the Medi-Cal, AFDC and Food Stamp programs implement a statewide IEVS.
- o Requires computer cross matches with certain files including state wage data, Unemployment Insurance (UI) benefit data, benefit and wage data maintained by the Social Security Administration (SSA) and unearned income data maintained by the Internal Revenue Service (IRS) and/or Franchise Tax Board (FTB).
- o Requires matches be performed for:
 - Applicants, at the time of application
 - Recipients, when files to be matched against are updated.

- o Requires that match information be used in determining eligibility and grant amounts.
- Requires follow-up and completion of case action for all match data within 30 days; if match data requires verification with a third party resource, then case action may be delayed beyond 30 days, but for no more than 20% of matches pending the receipt of requested third party verification. None may be delayed beyond redetermination.
- o Requires maintenance of records regarding the use and the disposition of IEVS match data.
- o Final Federal rules became effective May 29, 1986. The effective date may be delayed through September 30, 1986 if a state submits a plan, which is approved by the Federal government, describing a good faith effort to comply. The state has submitted to Federal agencies its request of waiver of the effective date.

What California Needs To Do To Comply with IEVS

Summarized below are major tasks California must perform to meet IEVS requirements.

- Develop and implement a central data base for applicants of all three programs;
- o Expand existing statewide matching processes for recipients to include matches against Federal wage data and IRS unearned income data, and the addition of Nonassistance Food Stamp and Medi-Cal Only populations where not now included;
- o Develop automated systems enabling matches against the Employment Development Department (EDD) wage and benefit data bases for applicants;
- Develop automated systems to access and use SSA BENDEX data, wage data, and the Social Security Number (SSN) numeric identification (numident) file for applicants;
- Develop and/or revise automated systems to access and use IRS and/or FTB unearned income data for both applicants and recipients;
- o Follow-up on all matches within prescribed time limits;
- o Develop a statewide Applicant and Recipient reporting system.

Status of IEVS Development

The Department of Health Services (DHS) and Department of Social Services (DSS) are working jointly toward IEVS implementation. Responsibilities for IEVS are being shared according to system type; i.e., the Applicant system and Recipient system respectively. This approach allows us to build upon existing processes.

DSS already has in place three Recipient matching systems: Integrated Earnings Clearance/Fraud Detection System (IEC/FDS); Payment Verification System (PVS) and the Asset Match (unearned income). DSS is assuming responsibility to modify/expand these systems as necessary so all three programs will comply with IEVS requirements for the Recipient system.

DHS will be responsible for design and development of the IEVS Applicant system for all three programs. The Applicant system will utilize the existing statewide MEDS communications network.

There will be pilot tests of both the IEVS Applicant system and, for Medi-Cal only, the Recipient system. These pilots are described in detail later in this letter. The pilots are expected to begin in September 1986 for the Recipient system and in January 1987 for the Applicant system and continue for six months. During this period, evaluations will be conducted including the matching processes and productivity of matches. It is planned that during Fiscal Year 1987/88 the IEVS Applicant system will be expanded statewide in a phased manner. Attachment A provides workplans with major milestones of implementation activities at the state level.

<u>Funding</u>

We recognize there will be additional county resources required to process expanded volumes of match data, for reporting, and perhaps for other activities and data processing changes. Budget requests submitted by DHS and DSS for IEVS for the Fiscal Year 1986/87 include funds for county administrative costs. DHS and DSS plan to make a special allocation of funds for the pilot counties. Since IEVS is a Federal mandate, the counties will be reimbursed for additional costs created by IEVS based upon the normal Federal/State/County sharing ratio under Medi-Cal, AFDC, and Food Stamps respectively.

County Data Processing (DP) Development

For any county DP modifications or enhancements, the counties must submit their proposal to the County Approval Section of DSS for review and approval.

County Coordination

DHS and DSS have jointly arranged through CWDA the establishment of an IEVS Advisory Group. (See Attachment B for the purpose of the Group and list of representatives.) Meetings have already been held with each of the northern and southern subgroups of counties, with DSS/DHS staff making presentations on IEVS requirements, state developmental plans and program issues, and pilot county selection criteria. We will be sharing information and seeking county input through the IEVS Advisory Group throughout development and implementation of IEVS.

Pilot Testing

An integral part of the development of the IEVS Applicant system and expansion of the Recipient system will be pilot testing, which is described as follows:

- The Recipient system pilot will be limited to Medi-Cal Only (MCO) recipients which will be added to the state wage match and asset match. Four counties comprising about 10% of MCO population will be selected for this pilot. For the assets match, the match data for two pilot counties will first be screened by DHS Audits and Investigations Division staff before being referred to the counties (similar to the current DSS process). The other two counties will receive assets match data directly from the system for screening and Thus, there will be two "models" for the asset match. Wage match data will all be returned directly to We plan to evaluate the effectiveness of pilot counties. recipient matches and matching processes and conduct time studies for budget purposes. The Recipient pilot is expected to begin in September 1987.
- The Applicant system pilot will be directed toward all three programs, Medi-Cal, AFDC and Food Stamps. Five counties comprising about 10% of the statewide population for all three programs will be selected for this project. The MEDS network will be available to transmit input data from counties and return match results to counties. intended that both online and batch modes will be made available as county options. The pilot is planned to begin in January 1987 and run at least 6 months until statewide expansion is scheduled to begin. The intent is to pilot different "models" in order to eventually offer variations which best accommodate a county's particular operations. Here also, we intend to evaluate the effectiveness of each type of match and matching process, and conduct time studies for budgeting purposes.

Pilot County Selection

Criteria for selection of pilot counties was developed by the State and presented at the first County Advisory Group meeting; the criteria are included as Attachment C. The intent is to select a cross-section of California counties in terms of size, location, type of EDP system, etc.

Selection Process

Through this letter we are soliciting counties to volunteer for either the Applicant pilot, Recipient pilot, or both. Counties may volunteer either by calling or writing to:

Charlie Marvin, Chief Corrective Action Bureau Department of Social Services 744 P Street, MS 16-30 Sacramento, CA 95814 (916) 445-4458 Ed Briles, Chief Systems Development Section Department of Health Services 744 P Street, Room 1100 Sacramento, CA 95814 (916) 445-5088

Your response is requested no later than July 1, 1986.

If you have any questions about IEVS or require further information on pilot testing, please contact Ed Briles of DHS Data Systems Branch at (916) 445-5088 or Michiyo Laing of DSS Corrective Action Bureau at (916) 445-4458.

Participation in this pilot will provide counties with a unique opportunity to assist the State and Federal government to refine and enhance IEVS matching processes to provide counties with useful information in an effective manner. We encourage your participation in this endeavor.

Sincerely

Bob Horel

Deputy Director

Welfare Program Operations Division Department of Social Services

Dav de Dewereck to Doris Z. Soderberg, Chief Medi-Cal Eligibility Branch Department of Health Services

cc: Larry Leaman, President CWDA

PROJECT: IEVODO1 -- Income and Eligibility Verification System -- Applicant System Workplan (IEVS-APP WKPLANI)

DATE PREPARED: 04/23/86 PAGE: 1 of 1

ox No	TASK DESCRIPTION	RESPONSIBLE OFFICE 1/2/3/4/5/6/7/	APR MAY JUN JUL AUG SEP OCT NOV D	1987 Compl. DEC JAN FEB MAR APR Date
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CWDA Income and Eligibility Verification System (IEVS) Advisory Group

Purpose of the Advisory Group

The purpose of the CWDA IEVS Advisory Group is to provide the State Departments of Social Services (DSS) and Health Services (DHS) with county input in program and systems areas impacted by the development and implementation of IEVS.

Members

The CWDA IEVS Advisory Group includes representatives from fourteen counties. The members also represent five CWDA Committees (Family Eligibility and Grant, Food Stamp, Medical Care, MIS and Fiscal), the California Welfare Fraud Investigators Association (CWFIA) and the 20 Small Counties. The members are divided into two subgroups - north and south, to facilitate their participation. Additionally, the pilot counties, upon selection, will have representatives on the Advisory Group.

Meetings

Meetings will:

- o Be held as needed (generally, not more than once a month)
- o Be held in Sacramento for the north group and in one of the southern counties for the south group.

Roles and Responsibilities

County members will:

- o Represent counties on matters related to the development and implementation of IEVS.
- o Review and comment on written materials provided by state staff on issues related to IEVS development, pilot evaluation, implementation and operation.
- o Identify county issues and concerns related to IEVS development, pilot evaluation, implementation and operation and provide input on these concerns to DSS and DHS.

State staff will:

- o Establish meeting places and times, notify members and prepare the meeting agenda.
- o Record minutes of meetings.
- o Identify areas/issues needing county input and prepare documents for review and comment.
- o Keep the committee informed of major decisions and the progress of implementation.

Tenure

The CWDA IEVS Advisory Group will be dissolved when it is determined that county input is no longer needed.

IEVS APPLICANT SYSTEM

PILOT COUNTY SELECTION CRITERIA

- 1. Interest/Volunteer
 Willingness to Participate
 Pilot Both Applicant/Recipient Systems
- 2. Mixture of System Types Case Data Butte Independent On-line
- County System Contains all Individuals in the Household (or could be modified easily/timely to obtain them)
- 4. Mixture of County Applicant Workload
 Large
 Medium
 Small
- 5. Effective Use of Current Match Data Timely Follow-up Work All Matches Report on All Cases
- 6. Ability to Handle Added Workload
- 7. Statewide Representation of Counties
- 8. Security Provisions (especially for IRS)

OTHER CONSIDERATIONS

- Contention with other State/County Systems
- Accessibility of EDP Resources (in-house or outside contract for EDP development and operation)
- 3. Fraud Early Detection (FRED) System (in one county)
- 4. UI System in County (or will be by 1/1/87)

IEVS RECIPIENT SYSTEM

PILOT COUNTY SELECTION CRITERIA

- 1. Interest/Volunteer
 Willingness to Participate
 Pilot Both Applicant/Recipient Systems
- County Systems Compatible w/ IEVS Requirements
 Easily Modified to Provide MCO Population
 Contains Earned Income
- Proximity to DHS Investigations Office (two counties)
- 4. Effective Use of Current Match Data
 Timely Follow-up
 Work All Matches
 Report on All Cases
- 5. Ability to Handle Added Workload
- 6. Mixture of County Recipient Workload Large Medium Small
- 7. Statewide Representation of Counties
- 8. Security Provisions (especially for IRS)

OTHER CONSIDERATIONS

- Contention with other State/County Systems
- 2. Accessibility of EDP Resources (in-house or outside contract for EDP development and operation)
- 3. UI System in County
 (or will be by 1/1/87)